

Exhibit 2

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May 21, 2010

VIA E-MAIL

Marc Seltzer
Susman Godfrey L.L.P.
Suite 5100
1000 Louisiana Street
Houston, Texas 77002

Re: *In re Toyota Motor Corp. Unintended Acceleration Marketing, Sales Practices, and Products Liability Litigation*, Case No. 8:10ML02151 JVS (FMO)

Dear Counsel:

I am in receipt of your letter of May 19, 2010. Toyota does not agree to provide the documents identified in categories 1 through 7 of your letter in advance of your filing of the consolidated complaint(s). Your request for these documents is inconsistent with Judge Selna's May 14, 2010 Order, the Federal Rules of Civil Procedure, and the local rules of the Central District of California.

There is no legitimate basis to depart from the Federal Rules, which do not authorize discovery prior to the filing of the consolidated complaint(s). Hundreds of complaints have been filed against Toyota to date relating to allegations of unintended acceleration, and presumably, those cases were filed in compliance with Rules 11 and 8(a)(2). The consolidated complaint(s) are designed to consolidate the claims asserted against Toyota in the MDL, and there is no basis within the Federal Rules or otherwise to justify discovery in advance of your filing the consolidated complaint(s).

The timing of filing of the consolidated complaint(s) by plaintiffs is a separate issue from the sequencing, timing, and organization of the discovery in the MDL. In his May 14 Order, Judge Selna set forth a timetable for entry of a comprehensive plan for all forms of discovery to ensure that an orderly and efficient process for discovery is followed. Per Section IV. B. of the May 14 Order, the June 25 hearing has been scheduled for that purpose, and the parties will meet and confer in advance of that date to determine if we can reach agreement on the issues specified in his order. Once a discovery plan and scheduling order are in place, we anticipate that discovery will

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proceed consistent with the Court's orders, the Federal Rules of Civil Procedure, and the local rules of the Central District of California.

We will meet and confer with you regarding your request for production of the documents identified in categories 1 through 7 of your letter in advance of the June 25 hearing. We do not agree to produce them prior to your filing of the consolidated complaint(s).

Sincerely yours,



Cari K. Dawson

CKD:dbd

cc: Elizabeth Cabraser (*Via E-Mail*)
Steve Berman (*Via E-Mail*)
Frank Pitre (*Via E-Mail*)
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